SOUTHERN DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
United States of America,	
v.	07 Cr. 814 (JFK)
Rodolphe Nogbou,	
Defendant.	

CERTIFICATE OF SERVICE

I, Jared R. Jenkins, an attorney duly admitted to practice law before this Court, certify under penalty of perjury that on August 13, 2008, I caused to be served a true copy of Defense Counsel's Sentencing Memorandum on behalf of Rodolphe Nogbou, dated August 13, 2008, and the accompanying Exhibits, on the following attorney of record:

BY HAND

Mr. John P. Cronan Assistant United States Attorney United States Department of Justice Southern District of New York One Saint Andrew's Plaza New York, New York 10007

Dated: August 13, 2008 New York, New York